

Albano, Emily

From: Cheever, Robert
Sent: Monday, September 08, 2014 8:37 AM
To: HertzWu, Sara
Subject: CAM email--Bob Cheever
Attachments: 2012-11-003f.pdf

Here is the only email I am aware of that in any discusses CAM Plans.

Bob

From: Rugen, Alana [mailto:alana.rugen@dnr.mo.gov]
Sent: Wednesday, June 25, 2014 4:39 PM
To: Cheever, Robert
Cc: Hale, Kendall; Knodel, Jon; Anderson, Kenneth J (KAnderson@ameren.com)
Subject: RE: Question...

Bob,

Ameren – Labadie has submitted a minor modification requesting modification of Permit Condition (B-1 through B-4) – 003 Operational Limitation #1 in OP2011-020B (see attachment), issued July 12, 2013: “The permittee shall perform stack testing using Method 17 for filterable PM by no later than November 1, 2014.”

Specifically, Ameren is requesting to extend their required CAM retesting date(s) as they are modifying the control systems on their boilers in anticipation of MATS. The control systems upgrades will be staggered due to timing, site congestion, resource constraints, and unit availability. To fulfill Ameren’s request, the operational limitation would be changed to:

“The permittee shall perform stack testing using Method 17 for filterable PM by no later than the dates provided in the following table:

Emission Unit	Performance Test Date
1	No later than February 28, 2015
2	No later than November 1, 2014
3	No later than June 30, 2016
4	No later than August 31, 2015

Do you believe this project can be processed as a minor modification or should it be processed as a significant modification?

Thanks,

Alana L. Rugen, PE
Environmental Engineer III
Missouri Department of Natural Resources

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Air Pollution Control Program – Permits Section
Attn: Alana Rugen
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From: Cheever, Robert [<mailto:cheever.robert@epa.gov>]
Sent: Tuesday, June 10, 2014 2:44 PM
To: Rugen, Alana
Cc: Hale, Kendall; Knodel, Jon
Subject: RE: Question...

Alana,

§70.7(e) defines permit modification as any revision to a Part 70 permit that cannot be accomplished under the program's provisions for administrative permit amendments and §70.7(e)(4) says significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

Based on my read, this requested change is not an administrative amendment as set out in §70.7(d) and neither is a minor permit modification as set out in §70.7(e)(2). So therefore, it would appear as if this requested change is a major modification.

Bob

From: Rugen, Alana [<mailto:alana.rugen@dnr.mo.gov>]
Sent: Friday, May 23, 2014 3:28 PM
To: Cheever, Robert
Subject: Question...

Bob,

I have an installation which has submitted a request for a minor modification to their Title V permit. §70.7(e)(2)(i)(A) states that minor permit modification procedures may be used only for those permit modifications that:

- (2) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- (3) Do not require or change a case-by-case determination of an emission limitation or other standard, or source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- (4) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

Specifically, the installation's request is to postpone their stack testing (required every three years) to demonstrate ongoing compliance with their CAM plan and 10 CSR 10-6.405 as they are in the process of upgrading their control system. They wish to instead conduct the stack testing no later than six months after the completion of the control system upgrade.

Would the installation's request be considered a significant change to existing monitoring? Would the installation's request be considered a change to a case-by-case determination of compliance with an emission limitation? The requirement for repeat stack testing every three years technically has no underlying applicable requirement. CAM would require repeat stack testing for CAM plan renewal which would coincide with operating permit (~every five years)....

I'd like your opinion as to whether the project can be processed as a minor modification or whether it fails the criteria and must be processed as a major modification.

Thanks,

Alana L. Rugen, PE
Environmental Engineer III
Missouri Department of Natural Resources

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